

IN THE UNITED STATES DISTRICT COURT FILED IN CLERK'S OFFICE  
FOR THE NORTHERN DISTRICT OF GEORGIA U.S.D.C. - Atlanta

Atlanta DIVISION

OCT 28 2022

Alfred Reynolds  
(Print your full name)

Plaintiff *pro se*,

v.

Dekalb County School District  
Dr. Angela Collins  
Harvey Terrence  
SHARIE Henderson

(Print full name of each defendant; an employer is usually the defendant)

Defendant(s).

KEVIN P. WEIMER, Clerk  
By: Kimberly Weimer Deputy Clerk

CIVIL ACTION FILE NO.

1:22-CV-4299

(to be assigned by Clerk)

**PRO SE EMPLOYMENT DISCRIMINATION COMPLAINT FORM**

**Claims and Jurisdiction**

1. This employment discrimination lawsuit is brought under (check only those that apply):

X

Title VII of the Civil Rights Act of 1964, 42 U.S.C. §§ 2000e et seq., for employment discrimination on the basis of race, color, religion, sex, or national origin, or retaliation for exercising rights under this statute.

**NOTE:** To sue under Title VII, you generally must have received a notice of right-to-sue letter from the Equal Employment Opportunity Commission ("EEOC").

\_\_\_\_\_ Age Discrimination in Employment Act of 1967, 29 U.S.C. §§ 621 et seq., for employment discrimination against persons age 40 and over, or retaliation for exercising rights under this statute.

**NOTE:** To sue under the Age Discrimination in Employment Act, you generally must first file a charge of discrimination with the EEOC.

\_\_\_\_\_ Americans With Disabilities Act of 1990, 42 U.S.C. §§ 12101 et seq., for employment discrimination on the basis of disability, or retaliation for exercising rights under this statute.

**NOTE:** To sue under the Americans With Disabilities Act, you generally must have received a notice of right-to-sue letter from the EEOC.

\_\_\_\_\_ Other (describe) \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

2. This Court has subject matter jurisdiction over this case under the above-listed statutes and under 28 U.S.C. §§ 1331 and 1343.

**Parties**

3. Plaintiff. Print your full name and mailing address below:

Name Alfred Reynolds  
Address 140 Eagle Point Blvd  
Auburn Dale, FL 33823

4. Defendant(s). Print below the name and address of each defendant listed on page 1 of this form:

Name DeKalb County School District  
Address 1701 Mountain Industrial Blvd  
Stone Mountain, GA 30083

Name Dr. Angela Collins  
Address 1701 Mountain Industrial Blvd  
Stone Mountain, GA 30083

Name Terrence Harvey and Sharee Henderson  
Address Salem Middle School  
5333 Salem Rd  
Stonecrest, GA 30038

**Location and Time**

5. If the alleged discriminatory conduct occurred at a location different from the address provided for defendant(s), state where that discrimination occurred:

DeKalb County School District's HR office  
Salem Middle School



6. When did the alleged discrimination occur? (State date or time period)

From August 2014 until January 2022  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**Administrative Procedures**

7. Did you file a charge of discrimination against defendant(s) with the EEOC or any other federal agency? X Yes \_\_\_\_\_ No

If you checked "Yes," attach a copy of the charge to this complaint.

8. Have you received a Notice of Right-to-Sue letter from the EEOC?

X Yes \_\_\_\_\_ No

If you checked "Yes," attach a copy of that letter to this complaint and state the date on which you received that letter:

08/10/2022

9. If you are suing for **age discrimination**, check one of the following:

\_\_\_\_\_ 60 days or more have elapsed since I filed my charge of age discrimination with the EEOC

\_\_\_\_\_ Less than 60 days have passed since I filed my charge of age discrimination with the EEOC

10. If you were employed by an agency of the State of Georgia or unsuccessfully sought employment with a State agency, did you file a complaint against defendant(s) with the Georgia Commission on Equal Opportunity?

\_\_\_\_ Yes

~~\_\_\_\_~~ No

~~\_\_\_\_~~ Not applicable, because I was not an employee of, or applicant with, a State agency.

If you checked "Yes," attach a copy of the complaint you filed with the Georgia Commission on Equal Opportunity and describe below what happened with it (i.e., the complaint was dismissed, there was a hearing before a special master, or there was an appeal to Superior Court):

---

---

---

---

11. If you were employed by a Federal agency or unsuccessfully sought employment with a Federal agency, did you complete the administrative process established by that agency for persons alleging denial of equal employment opportunity?

\_\_\_\_ Yes

\_\_\_\_ No

~~\_\_\_\_~~ Not applicable, because I was not an employee of, or applicant with, a Federal agency.

If you checked "Yes," describe below what happened in that administrative process:

---

---

---

---

**Nature of the Case**

12. The conduct complained about in this lawsuit involves (check only those that apply):

☐ failure to hire me  
☐ failure to promote me  
☐ demotion  
☐ reduction in my wages  
☐ working under terms and conditions of employment that differed from similarly situated employees  
☐ harassment  
☒ retaliation  
☐ termination of my employment  
☐ failure to accommodate my disability  
☒ other (please specify) Suspension of my teaching license without due cause

13. I believe that I was discriminated against because of (check only those that apply):

☐ my race or color, which is \_\_\_\_\_  
☐ my religion, which is \_\_\_\_\_  
☐ my sex (gender), which is ☐ male ☐ female  
☒ my national origin, which is Haiti  
☐ my age (my date of birth is \_\_\_\_\_)  
☐ my disability or perceived disability, which is: \_\_\_\_\_

☐ my opposition to a practice of my employer that I believe violated the federal anti-discrimination laws or my participation in an EEOC investigation

☐ other (please specify) \_\_\_\_\_



14. Write below, as clearly as possible, the essential facts of your claim(s). Describe specifically the conduct that you believe was discriminatory or retaliatory and how each defendant was involved. Include any facts which show that the actions you are complaining about were discriminatory or retaliatory. Take time to organize your statements; you may use numbered paragraphs if you find that helpful. Do not make legal arguments or cite cases or statutes.

I was hired by DeKalb County School District on August 2014 to teach French at Salem Middle School. During the hiring process, personnel from Human Resources stated any teacher can ask to be transferred to another school if that teacher remains in the original school after 2(two) years. While working at Salem, I was subjected to unlawful employment practice. For example Sharee Henderson - an assistant principal - started to ask me personal questions about my state of upbringing and my backgrounds in Haiti. Further, every end of the year, she always refused to accept my failure report stating the failed students should pass and I need to update my grade sheets. When I told her that I have contacted the student parents, she ignored me. When I contacted the principal Harvey Terrence, he ignored me also. One time, Mr. Harvey threatened me to be arrested if students are fighting in my class and I refuse to separate them. This threat was made during a staff meeting.

(Please, see attached files)

(Attach no more than five additional sheets if necessary; type or write legibly only on one side of a page.)

15. Plaintiff            still works for defendant(s)  
 no longer works for defendant(s) or was not hired
16. If this is a disability-related claim, did defendant(s) deny a request for reasonable accommodation?            Yes            No

If you checked "Yes," please explain: \_\_\_\_\_

17. If your case goes to trial, it will be heard by a judge unless you elect a jury trial. Do you request a jury trial? ✓ Yes        No

### Request for Relief

As relief from the allegations of discrimination and/or retaliation stated above, plaintiff prays that the Court grant the following relief (check any that apply):

- ☒ Defendant(s) be directed to my loss salary for the  
2021-2022 school year
- ☒ Money damages (list amounts) \$500,000 I was  
forced to sell my house, withdrawn my pension plan, and  
borrow money!
- ☒ Costs and fees involved in litigating this case
- ☒ Such other relief as may be appropriate



**PLEASE READ BEFORE SIGNING THIS COMPLAINT**

Before you sign this Complaint and file it with the Clerk, please review Rule 11 of the Federal Rules of Civil Procedure for a full description of your obligation of good faith in filing this Complaint and any motion or pleading in this Court, as well as the sanctions that may be imposed by the Court when a litigant (whether plaintiff or defendant) violates the provisions of Rule 11. These sanctions may include an order directing you to pay part or all of the reasonable attorney's fees and other expenses incurred by the defendant(s). Finally, if the defendant(s) is the prevailing party in this lawsuit, costs (other than attorney's fees) may be imposed upon you under Federal Rule of Civil Procedure 54(d)(1).

Signed, this 28 day of October, 20 22

Alfred Reynolds  
(Signature of plaintiff *pro se*)

Alfred Reynolds  
(Printed name of plaintiff *pro se*)

140 Eagle Point Blvd  
(street address)

Auburnsdaile, FL 33823  
(City, State, and zip code)

areynolds9@liberty.edu  
(email address)

(404) 713-4441  
(telephone number)

## **CLAIM OF EMPLOYMENT DISCRIMINATION**

### **EEOC CHARGE**

September 4, 2022

My name is Alfred Reynolds, and I was working as a World Language teacher teaching French at Salem Middle School in Lithonia, Georgia. I am also a member of the World Language Curriculum Team for the district. This is a job that I held from August 2014 until June 2021. I have resigned my teaching job on June 21, 2021, after I realized that I am stuck probably for life at that school despite that I have applied for a transfer every year.

Indeed, since I started working there, the requirement to get a transfer to another school is based on a minimum of two years working at the same location. During these two years, I came to a professional conclusion that I need to leave because the students, particularly those who are in my advanced French class (Carnegie), seemed not willing to make any extra effort to learn the language and to pass the class. I have been pressured several times by the administration (principal, assistant-principal, and counselor) to pass those students so they could get high school credits. For example, every end of the year, I must submit a report on the number of students who failed my class. In that report, despite that I documented very well my contacts with the students' parents, the assistant-principal always refused to get back my report until I make a correction about the failing students in the system, which is called Infinite Campus. Knowing that I do my job accordingly, I always refused while pointing at my documentation, which is always not appreciated by administration. First, I had a serious discussion during a cluster meeting with the principal, Harvey Terence, and other colleagues regarding the consistent fighting and disrespect about the students in my classroom and other places. He was threatening me in front of everyone to be arrested if I refuse to separate students who are fighting. Second, I had another argument with the principal because he refused to take the failed students from my classroom roster, which is in direct contradiction with the district's rules for students who are in World Languages or Carnegie classes. Third, the assistant-principal, Sharee Henderson, after appearing to be a supportive administrator, started to ask me personal questions about my state of upbringing and my backgrounds in Haiti, which is my native country. Then, she started to confront me or question me in front of those students who misbehaved in my class usually after I wrote them up about their behavior. It became clear that I am the one who misbehaves in class instead of the students.



Fourth, the district, starting for the 2017 school year and the end of my two years requirement, decided to require each teacher to sign the contract for the following school year if that teacher wants to be transferred to another location, which I considered to be arbitrary. In a way, the administration or Human Resources tried to lock in the teacher every year and the teacher never gets the transfer that he has requested. Also, there is an unofficial pact that is made between principals that if one of their schools is losing good teachers, the principal should not take that teacher from that losing school if that school has difficulties to find teachers. In fact, Salem Middle School is one of the worst middle schools in Dekalb County and they have problem to get good teachers. Surely, once a teacher is hired for Salem, and he started to know and learn about the school administration's modus operandi, he/she quickly left the school or asked for an immediate transfer.

In my case, I have never tried to leave Salem. I have followed their rules by always signing their contract for the next school year, one after the other, filing for a transfer, and waiting to get a transfer, which I never got. However, starting in 2017, I have decided to apply in other school districts, but never got the job despite that I got good interviews and great feedbacks from my interviewers. When I inquired from my interviewers, whom I always met at teachers' conferences and even as classmates in a graduate program at the University of Georgia, they always asked me whether I am teaching in a bad school considering they never received any feedback from any member of the school administration despite their calls and emails. Then, I have decided to resign on June 21, 2021 by sending a letter to the Office of Human Resources. Immediately following my resignation letter, Dr. Angela Collins – HR Director – called me and told me she is refusing me to leave and “ordered” me to stay in Salem. When I told her that I am not going back to Salem for another year, she stated that I am in breach of my contract, she threatens to take my teaching license away if I refused to stay teaching at Salem Middle School for another year. I told her that I am willing to go to another school within the district, but I refused to go back to Salem. Then, she hung up the telephone on me, which was the last time I heard from her.

Then, on June 23, 2021, I received two job offers from Fulton County School District in Georgia. When the HR director from Fulton County started the hiring process, they called me to tell me that they cannot hire me because I needed a release letter from Dekalb County, which in turn refused to allow me to work for Fulton stating that I am still under contract with them. Further, on October 15, 2021, I received a letter from Mr. Paul E. Shaw, the director of Educator Ethics Division, from the Georgia Professional Standards Commission, stating that I am under



investigation for breach of contract after they received a complaint from Dekalb County School District. In the meantime, I had to withdraw all my retirement money to survive and to pay my bills. I also started to inquire on why Dekalb County School District's HR has decided to block me from being hired by another district, which was Fulton County School District. There are a few colleagues who call me and told me the school principal, Harvey Terrence, is the one who refused to let me go because he wanted to teach me a lesson for refusing to by his rules. Then, I have learned there are teachers who left Salem or let them to be transferred. Further, they should not even block me from leaving the school because I have not breached their contract particularly when I left in the middle of summer. For those teachers who have breached their contracts, they made them pay a small fee, which is between \$700 to \$1,000. So, why HR went to that extreme to block me from teaching? Simple, it is because of ethnicity, which is Haitian.

On January 18, 2022, I received another letter from the Georgia Professional Standards Commission stating that my educator license is suspended. I wrote Nancy Steele, Senior Paralegal, for the Commission and I asked her for a hearing after they asked me to sign a consent form. On January 28, 2022, Wylencia Monroe, who is the Senior Assistant Attorney General from the Georgia Government Services and Employment, told me that she is going to schedule a hearing after asking me a written letter from each of my preferred colleagues who are willing to write on my behalf. I did request a letter from five (5) of my colleagues and I never got that hearing. However, surprisingly on April 14, 2022, I received another letter from the Commission stating that there was "no probable cause" for them to suspend my teaching license, which was reinstated that same day.

Signed: *Alfred Reynolds*  
World Language Teacher

1:22-CV-4299



## U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

Atlanta District Office  
100 Alabama Street, SW, Suite 4R30  
Atlanta, GA 30303  
1-800-669-4000  
Website: [www.eeoc.gov](http://www.eeoc.gov)

### **DISMISSAL AND NOTICE OF RIGHTS**

(This Notice replaces EEOC FORMS 161 & 161-A)

Issued On: 08/10/2022

To: Mr. Alfred Reynolds  
4209 Elm Trace Drive  
Loganville, GA 30052  
Charge No: 410-2022-05253

EEOC Representative and email: Triet Bui  
Federal Investigator  
[triet.bui@eeoc.gov](mailto:triet.bui@eeoc.gov)

---

### **DISMISSAL OF CHARGE**

The EEOC is closing this charge because your charge was not filed within the time limits under the law; in other words, you waited too long after the date of the alleged discrimination to file your charge.

### **NOTICE OF YOUR RIGHT TO SUE**

This is official notice from the EEOC of the dismissal of your charge and of your right to sue. If you choose to file a lawsuit against the respondent(s) on this charge under federal law in federal or state court, **your lawsuit must be filed WITHIN 90 DAYS of your receipt of this notice.** Receipt generally occurs on the date that you (or your representative) view this document. You should keep a record of the date you received this notice. Your right to sue based on this charge will be lost if you do not file a lawsuit in court within 90 days. (The time limit for filing a lawsuit based on a claim under state law may be different.)

If you file a lawsuit based on this charge, please sign-in to the EEOC Public Portal and upload the court complaint to charge 410-2022-05253.

On behalf of the Commission,

Digitally Signed By: Darrell Graham  
08/10/2022

---

Darrell Graham  
District Director

**Cc:**

Derek Carson  
1701 Mountain Industrial Blvd  
Stone Mountain, GA 30083

Please retain this notice for your records.



1:22-CV-4299

EEOC Form 5 (11/09)

<b>CHARGE OF DISCRIMINATION</b>  This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.	Charge Presented To: <b>EEOC</b>  Agency(ies) Charge No(s): <b>410-2022-05253</b>
and EEOC	
_____ <i>State or local Agency, if any</i>	

Name (indicate Mr., Ms., Mrs.) <b>Mr. Alfred Reynolds</b>	Home Phone <b>(404) 713-4441</b>	Year of Birth <b>1968</b>				
Street Address <b>4209 Elm Trace Drive LOGANVILLE, GA 30052</b>						
Named is the Employer, Labor Organization, Employment Agency, Apprenticeship Committee, or State or Local Government Agency That I Believe Discriminated Against Me or Others. (If more than two, list under PARTICULARS below.)						
Name <b>Dekalb County School District</b>	No. Employees, Members <b>501+ Employees</b>	Phone No. <b>(678) 676-0094</b>				
Street Address <b>1701 MOUNTAIN INDUSTRIAL BLVD STONE MTN, GA 30083</b>						
Name	No. Employees, Members	Phone No.				
Street Address						
City, State and ZIP Code						
DISCRIMINATION BASED ON  <b>National Origin</b>	DATE(S) DISCRIMINATION TOOK PLACE  <table border="0"> <tr> <td>Earliest</td> <td>Latest</td> </tr> <tr> <td>01/10/2022</td> <td>01/10/2022</td> </tr> </table>		Earliest	Latest	01/10/2022	01/10/2022
Earliest	Latest					
01/10/2022	01/10/2022					
THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)): I. I was hired by the above-named employer in August 2014, as a Language Teacher (French). Throughout my employment, I was harassed by coworkers and supervisors because I refused to give passing grades to students who under-performed. I was told that this is America, not France, we pass our students, and that I should go back to France. On June 21, 2021, my contract ended. I submitted my resignation. Angelica Collins, Director of Employment Service, denied my resignation and forced me into another two-year contract. Ms. Collins threatened to take away my Teaching License if I refused to return to the school. I refused to sign the contract. In June 2021, I received an offer to teach French by Fulton County School District. The offer was later rescinded because my employer told Fulton County School District that I was still under a contract. On January 10, 2022, I received a notice from the Georgia Professional Standard Commission that my license was suspended for breaching a contract. I requested a hearing. On April 15, 2022, the suspension was removed. II. I believe that I have been discriminated against because of my national origin (French) and retaliated against for opposing an unlawful employment practice, in violation of Title VII of the Civil Rights Act of 1964, as amended.						

I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.	NOTARY – When necessary for State and Local Agency Requirements
I declare under penalty of perjury that the above is true and correct.  <b>Digitally Signed By: Mr. Alfred Reynolds</b>  <b>07/30/2022</b>  <div style="text-align: right;"><i>Charging Party Signature</i></div>	I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief. SIGNATURE OF COMPLAINANT   SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE (month, day, year)

CP Enclosure with EEOC Form 5 (11/09)

**PRIVACY ACT STATEMENT:** Under the Privacy Act of 1974, Pub. Law 93-579, authority to request personal data and its uses are:

1. **FORM NUMBER/TITLE/DATE.** EEOC Form 5, Charge of Discrimination (11/09).
2. **AUTHORITY.** 42 U.S.C. 2000e-5(b), 29 U.S.C. 211, 29 U.S.C. 626, 42 U.S.C. 12117, 42 U.S.C. 2000ff-6.
3. **PRINCIPAL PURPOSES.** The purposes of a charge, taken on this form or otherwise reduced to writing (whether later recorded on this form or not) are, as applicable under the EEOC anti-discrimination statutes (EEOC statutes), to preserve private suit rights under the EEOC statutes, to invoke the EEOC's jurisdiction and, where dual-filing or referral arrangements exist, to begin state or local proceedings.
4. **ROUTINE USES.** This form is used to provide facts that may establish the existence of matters covered by the EEOC statutes (and as applicable, other federal, state or local laws). Information given will be used by staff to guide its mediation and investigation efforts and, as applicable, to determine, conciliate and litigate claims of unlawful discrimination. This form may be presented to or disclosed to other federal, state or local agencies as appropriate or necessary in carrying out EEOC's functions. A copy of this charge will ordinarily be sent to the respondent organization against which the charge is made.
5. **WHETHER DISCLOSURE IS MANDATORY; EFFECT OF NOT GIVING INFORMATION.** Charges must be reduced to writing and should identify the charging and responding parties and the actions or policies complained of. Without a written charge, EEOC will ordinarily not act on the complaint. Charges under Title VII, the ADA or GINA must be sworn to or affirmed (either by using this form or by presenting a notarized statement or unsworn declaration under penalty of perjury); charges under the ADEA should ordinarily be signed. Charges may be clarified or amplified later by amendment. It is not mandatory that this form be used to make a charge.

#### **NOTICE OF RIGHT TO REQUEST SUBSTANTIAL WEIGHT REVIEW**

Charges filed at a state or local Fair Employment Practices Agency (FEPA) that dual-files charges with EEOC will ordinarily be handled first by the FEPA. Some charges filed at EEOC may also be first handled by a FEPA under worksharing agreements. You will be told which agency will handle your charge. When the FEPA is the first to handle the charge, it will notify you of its final resolution of the matter. Then, if you wish EEOC to give Substantial Weight Review to the FEPA's final findings, you must ask us in writing to do so within 15 days of your receipt of its findings. Otherwise, we will ordinarily adopt the FEPA's finding and close our file on the charge.

#### **NOTICE OF NON-RETALIATION REQUIREMENTS**

Please **notify** EEOC or the state or local agency where you filed your charge **if retaliation is taken against you or others** who oppose discrimination or cooperate in any investigation or lawsuit concerning this charge. Under Section 704(a) of Title VII, Section 4(d) of the ADEA, Section 503(a) of the ADA and Section 207(f) of GINA, it is unlawful for an *employer* to discriminate against present or former employees or job applicants, for an *employment agency* to discriminate against anyone, or for a *union* to discriminate against its members or membership applicants, because they have opposed any practice made unlawful by the statutes, or because they have made a charge, testified, assisted, or participated in any manner in an investigation, proceeding, or hearing under the laws. The Equal Pay Act has similar provisions and Section 503(b) of the ADA prohibits coercion, intimidation, threats or interference with anyone for exercising or enjoying, or aiding or encouraging others in their exercise or enjoyment of, rights under the Act.



Georgia Professional  
Standards Commission



April 14, 2022

Mr. Alfred Reynolds  
4209 Elm Trace Drive  
Loganville, GA 30052

Re: Case # 21-8-224; Certificate # 1453149

Dear Alfred Reynolds:

FILED

APRIL 14, 2022

Professional Standards  
Commission  
Educator Ethics

The Professional Standards Commission ("PSC") is charged with the investigation of matters involving violations of any law and/or the Code of Ethics by Georgia educators, as well as the discipline of educators who perform such breaches. On April 14, 2022, the PSC reviewed the results of its investigation into allegations that you violated the Code of Ethics, Standard 9: Professional Conduct...*"The Educator signed an employment contract with the complainant schoolsystem. On or about June 21, 2021, the Educator resigned his employment position. The Educator indicatedthat the reasonfor the resignation was the school systemfailing to granthimatransfer to anotherschool."* The PSC determined that there was no probable cause to take disciplinary action against you.

Your disciplinary case has been closed and the file has been expunged. **Please keep a copy of this letter in a secure location for reference when applying for certification or employment in the future.**

Should you have any questions regarding this matter, please contact David Pumphrey, Chief Investigator, Educator Ethics Division, at (404) 232-2700 or (800) 537-5996.

Sincerely,

Laurin Vonada, Director  
Educator Ethics Division

LV: ka